



Eric Gonzalez  
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[INSERT NAME]  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: SHAHEED RAHEEM

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**Disclosure # 1:**

NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION AGAINST MOS RAHEEM DATED ON 05/02/2012:

ALLEGATION:

1. DEPARTMENT RULES VIOLATION – COURT NON - APPEARANCE/ COURT MONITORING.

CASE STATUS: CLOSED ON 08/07/2012

PENALTY: SCHEDULE B COMMAND DISCIPLINE

**Disclosure # 2:**

THE MOS ENTERED A PLEA OF GUILTY TO THE FOLLOWING DEPARTMENTAL CHARGES ARISING OUT OF AN INCIDENT ON OR ABOUT 11/13/2012 WHILE THE MOS WAS ASSIGNED TO NARCOTICS BOROUGH QUEENS AND OFF-DUTY:

ALLEGATIONS:

1. MOS RAHEEM, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY, OR DISCIPLINE OF THE DEPARTMENT, TO WIT: MOS RAHEEM USED THREATENING LANGUAGE DURING A VERBAL DISPUTE WITH HIS SPOUSE.

2. MOS RAHEEM WAS FOUND TO BE IN POSSESSION OF AN UNAUTHORIZED DUPLICATE SHIELD.

CASE STATUS: CLOSED ON 12/12/2014

PENALTY: THE MOS FORFEITED TEN (10) VACATION DAYS.

**Disclosure # 3:**

THE MOS ENTERED A PLEA OF GUILTY TO THE FOLLOWING DEPARTMENTAL CHARGES ARISING OUT OF AN INCIDENT ON OR ABOUT 07/21/2014 WHILE MOS WAS ASSIGNED TO THE 77<sup>TH</sup> PRECINCT:

ALLEGATIONS:

1. MOS RAHEEM, WHILE IN NEW YORK COUNTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT IN THAT MOS RAHEEM IMPROPERLY TOOK POSSESSION OF A DEPARTMENT GALAXY S4 SMART PHONE AND KEPT SAID PHONE AT HIS RESIDENCE FOR APPROXIMATELY ELEVEN (11) MONTHS.

2. MOS RAHEEM, WHILE IN NEW YORK STATE, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER,

EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT IN THAT MOS RAHEEM MADE, SENT, AND/ OR RECEIVED OR CAUSE TO BE MADE, SENT, AND/ OR RECEIVED, OVER 900 CALLS AND/OR TEXT MESSAGES FROM A DEPARTMENT SMARTPHONE WITHOUT AUTHORIZATION OR POLICE NECESSITY

3. MOS RAHEEM, WHILE IN NEW YORK COUNTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, IN THAT MOS RAHEEM FAILED TO RECORD, OR CAUSE TO BE RECORDED, A DEPARTMENT SMARTPHONE THAT HE ACQUIRED, IN THE INVESTIGATIVE SUPPORT DIVISION'S CELL PHONE DATABASE, AS REQUIRED.

THE MOS ENTERED A PLEA OF GUILTY TO THE FOLLOWING DEPARTMENTAL CHARGE ARISING OUT OF AN INCIDENT ON OR ABOUT AND BETWEEN 07/21/2014 TO 06/24/2015, WHILE MOS WAS ASSIGNED TO THE 77<sup>TH</sup> PRECINCT:

4. MOS RAHEEM, WHILE IN NEW YORK STATE, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, IN THAT MOS RAHEEM FAILED TO SAFEGUARD A DEPARTMENT SMART PHONE IN HIS POSSESSION WITH A PASSWORD.

CASE STATUS: CLOSED ON 09/28/2017

PENALTY: THE MOS PLACED ON DISMISSAL PROBATION FOR ONE (1) YEAR AND THE MOS FORFEITED FORTY (40) VACATION DAYS.

**Disclosure # 4:**

MOS RAHEEM IS A NAMED DEFENDANT IN THE FOLLOWING CIVIL ACTIONS:

1. MANUEL HERNANDEZ V. CITY OF NEW YORK, ET AL, 12-CV-6417-ILG-VVP FILED IN THE EASTERN DISTRICT OF NEW YORK.
2. YASER OTHMAN V. CITY OF NEW YORK, ET AL, 13-CV-4771 FILED IN THE EASTERN DISTRICT OF NEW YORK.

**BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:**

**Disclosure # 5:**

CCRB CASE: 201115889

REPORT DATE: 12/12/2011

INCIDENT DATE: 10/01/2011

[REDACTED]

Eric Gonzalez  
District Attorney  
Kings County